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January 6, 2015,

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
c/o Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel,  
Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of the Arvada Center for the Performing Arts and Humanities in Arvada, Colorado which provides approximately 440 performances a year to 124, 450 audience members and education programs to 39,275 students. The Mission of the Arvada Center is to provide Arts and Humanities to patrons and visitors near and far so they can be engaged, challenged and personally inspired to experience their world in new ways. I write with concern about protection for our wireless microphones and back-stage communications devices. We understand that performing arts entities using over 50 wireless devices will be eligible to apply for a Part 74 license. But we believe that the participation in the database of entities operating fewer devices is beneficial to the industry and potentially to their very viability. Otherwise these groups would be devoid of protection from future TV Band Devices that could undermine and potentially terminate a performing arts entity's operation of wireless production equipment.

The performing arts industry has standardized around the use of wireless technology. If their ability to continue using it is lost or undermined, it is possible that many such entities may go out of business, having so many facets of their operation dependent upon the use of this technology.

The Arvada Center owns and regularly uses over 66 channels of wireless devices in its presentation of professional theater, professional musicals, banquets, educational programming for children and adults, as well as live concerts for local and national acts, accessibility for the handicapped, and more. This figure includes 54 wireless microphones owned by the Arvada Center itself in three disparate frequency-agile ranges of 470 through 530 MHz (G1 band), 554 through 590 MHz (J1 band), and 638 through 698 MHz (L3 band). We often use forty or more channels of wireless microphones and communication for a given production, and frequently have up to four productions operating simultaneously, all using wireless microphones and other, similar wireless transmission devices.

In addition to wireless microphones, we employ many other analog wireless devices. We have three assisted listening systems operating in the VHF spectrum for hearing impaired patrons. Behind the scenes, many per-

sonnel use twelve additional channels of low and high UHF spectra for wireless radios and intercom systems to coordinate education programs, facilitate performances, and for the coordination of public safety.

In 2010 when the 700 MHz band was rendered illegal for use by performing arts institutions, we were forced to abandon 42 channels of wireless microphones and buy replacements at a cost of \$58,046.38, not including associated labor expenses, which were also considerable. As such, we fear the financial burden of having to again purchase new equipment either to deal with the potential dearth of interference protections provided to smaller organizations or to vacate future frequency bands reallocated by the FCC. Government programs/policy that would minimize expenses to replace equipment or allow the use of frequencies until the end of a product's life could potentially reduce this burden.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Philip C. Sneed

Executive Director  
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